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April 21, 2023

VIA ECF

Honorable James M. Wicks
United States District Court for the Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

**Re: Naiman v. Big Think Capital Inc.
Civil Action No. 2:22-cv-2531**

Dear Judge Wicks:

The Plaintiff and Defendant have conferred and are jointly proposing the following tentative dates for the completion of case events following discovery, which is currently set for June 30, 2023:

Expert Reports	July 28, 2023
Mediation Deadline	August 17, 2023
Class Certification filing deadline	August 31, 2023
Summary Judgment filing deadline	October 30, 2023
Status Conference post MSJ and Class Certification	30 days after the Court's Decision

Thank you to the Court for its consideration of our submission and please feel free to contact us if there are any questions.

Respectfully Submitted,

/s/ Anthony I. Paronich

Anthony I. Paronich

cc: All Counsel of Record (Via ECF)